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Attorneys for Plaintiff
SEAN COHEN

Attorneys for Defendant
TESLA, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SEAN COHEN, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

TESLA, INC. a California and Texas
Corporation; and DOES 1 through 50,
Inclusive,

Defendant.

Case No. 2:23-cv-7057-TJH (SKx)

**JOINT STIPULATION FOR
INDIVIDUAL ARBITRATION
AND DISMISSAL WITHOUT
PREJUDICE**

Ctrm: 9C
Judge: Hon. Terry J. Hatter Jr.

1 Pursuant to Rule 41(a)(1)(A)(ii), Plaintiff SEAN COHEN (“Plaintiff”) and
2 Defendant TESLA, INC. (“Defendant”) (collectively, “the Parties”) hereby
3 stipulate as follows:

4 1. This action is dismissed without prejudice, and Plaintiff shall pursue his
5 claims, including any claims for individual and public injunctive relief, in arbitration
6 on a non-class basis in accordance with the Parties’ agreement to arbitrate
7 (“Arbitration Agreement”) (Dkt. 13-2, Exhibit 1). Plaintiff may file his claims in
8 arbitration before the American Arbitration Association; and

9 2. The Parties reserve all rights with respect to asserting or challenging the
10 merits of their respective claims and any requested relief.

11 Dated: September 19, 2023

12 By s/ David Schrader
13 David L. Schrader

14 MORGAN, LEWIS & BOCKIUS LLP
15 *Attorneys for Defendant Tesla, Inc.*

16 Dated: September 19, 2023

17 By s/ Shalini Dogra
18 Shalini Dogra

19 DOGRA LAW GROUP PC
20 *Attorneys for Plaintiff*

SIGNATURE CERTIFICATION

Pursuant to Local Rule 5-4.3.4(a)(2), I hereby certify that Shalini Dogra, counsel for plaintiff Sean Cohen, concurs in the content of this document, and that I have obtained Ms. Dogra's authorization to affix her electronic signature to this document.

Dated: September 19, 2023

By s/ David Schrader
David L. Schrader

MORGAN, LEWIS & BOCKIUS LLP

Attorneys for Defendant Tesla, Inc.